

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CASE NO: 13-20772

HON. PAUL D. BORMAN

D-1 RASHMIEH YOUSEF ODEH,

Defendant.

_____ /

**REQUESTS AND NOTICES
IN COMPLIANCE WITH STANDING
ORDER FOR DISCOVERY AND INSPECTION**

In compliance with the Standing Order for Discovery and Inspection entered in this case, Defendant RASHMIEH YOUSEF ODEH, through her attorney, WILLIAM W. SWOR, hereby provides the Government with the following requests and notices:

1. It is here by requested that the Government provide copies or an opportunity to make copies of:

(a) Any information within the meaning of the “Standing Order”, paragraph 1(a) and/or Rule 16 (a)(1) of the Federal Rules of Criminal Procedure.

(b) A written summary of the expert testimony the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Criminal Evidence during its case in chief at trial. This summary must describe the witness’s opinions, the bases and the reasons therefore, and the witnesses’ qualifications. Rule 16 (a)(1)(G).

(c) Any exculpatory evidence within the meaning of the “Standing Order”, paragraph 1(b) and/or Brady v. Maryland, 373 U.S. 83 (1963) and United States v. Agurs, 427 U.S. 97 (1976).

(d) Any document which will be used to refresh the memory of a witness within the meaning of the “Standing Order”, paragraph 8 and/or Rule 612 of the Federal Rules of Evidence.

(e) Any statement by persons who have possible knowledge or information relative to this case which are not protected from disclosure by 18 U.S.C. § 3500.

(f) Any statement of witnesses within the meaning of 18 U.S.C. § 3500 (e).

2. Notice is hereby given pursuant to the “Standing Order”, paragraph 5 (b) that the foundation for any and all exhibits will be contested.

3. Notice is hereby given pursuant to the “Standing Order”, paragraph 6, that the chain of custody of any and all exhibits will be contested.

4. Notice is hereby given pursuant to the “Standing Order”, paragraph 7, that any scientific analysis or summary testimony by experts will be contested unless there has been a proper basis for the witness’ testimony under Rule 1006 of the Federal Rules of Evidence.

5. All requests for information, materials, or evidence contained herein are continuing and the prosecution is expected to immediately provide any additional information, materials, or evidence as required by the “Standing Order”, paragraph 3, and/or Rule 16(c) of the Federal Rules of Criminal Procedure.

6. Notices contained herein will remain in effect unless expressly withdrawn.

Respectfully submitted,

/s/ William W. Swor

WILLIAM W. SWOR (P21215)

Attorney for Defendant Odeh

645 Griswold, Suite 3060

Detroit, Michigan 48226

(313) 967-0200

Dated: November 21, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Mark J. Jebson
Special Assistant U.S. Attorney
211 W. Fort St., Ste. 2001
Detroit, MI 48226

Respectfully submitted,

/s/ William W. Swor

WILLIAM W. SWOR (P21215)
Attorney for Defendant Mazraani
645 Griswold, Suite 3060
Detroit, Michigan 48226
(313) 967-0200